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Attorneys for Defendant  
Sam's West, Inc.

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA AT ANCHORAGE

VICKIE JORGENSEN, )  
Plaintiff, )  
v. )  
SAM'S WEST, INC., )  
Defendants. )  
\_\_\_\_\_  
)

**NOTICE OF REMOVAL TO  
FEDERAL COURT**

Case No. 3:19-cv

TO: The United States District Court  
For the District of Alaska

AND TO: Derek Koehler  
Barber & Associates  
540 E 5th Ave.  
Anchorage, AK 99501

Please accept this as notice that, pursuant to 28 U.S.C. §§ 1331, 1332(a)(1), 1441 and 1446, the above defendant, SAM'S WEST, INC has this day filed in the United States District Court for the District of Alaska this Notice of Removal of the following action: *Jorgensen v. Sam's West, Inc.*, filed in the Superior Court for the State of Alaska, Third

Judicial District at Anchorage, Case No. 3AN-19-10920CI. Said defendant has filed a copy of this Notice with the Clerk of the Superior Court for the Third Judicial District at Anchorage, and said action has thereby been removed from the Superior Court to this United States District Court. (Ex. A)

The grounds for removal are as follows: Complete diversity of citizenship. 28 U.S.C. §§ 1331, 1332(a)(1), 1441 and 1446. Plaintiff is a resident and citizen of the State of Alaska (Ex. B, Amended Complaint at p.1). Defendant, Sam's West, Inc. is a Delaware corporation whose principal place of business is in Arkansas, and is therefore a citizen of Delaware and Arkansas. Accordingly, there is complete diversity of citizenship amongst the parties. Suit was filed by plaintiff against Sam's West, Inc. in Alaska Superior Court, Third Judicial District at Anchorage, on or about December 9, 2019 and was served on defendant's counsel on December 9, 2019. Plaintiff's complaint seeks damages of \$100,000 or more.

This removal is being filed within thirty (30) days after the receipt of the complaint against Sam's West, Inc. on December 9, 2019. (Ex. C)

Based on the above, this court has removal jurisdiction over this action, and defendant Sam's West, Inc. is entitled to remove this action to this Court from the Superior Court for the State of Alaska.

LAW OFFICES  
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DATED this 16<sup>th</sup> day of December 2019, at Anchorage, Alaska.

RICHMOND & QUINN  
Attorneys for Defendant  
*Sam's West Inc.*

By:

  
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by mail this 16 day of December 2019 on:

Derek Koehler  
Barber & Associates  
540 E 5<sup>th</sup> Ave.  
Anchorage, AK 99501

  
RICHMOND & QUINN  
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